

LEWIS BRISBOIS BISGAARD & SMITH LLP

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Attorneys for RPM EXPEDITE USA,

LLC; and RICARDO HABACUC

ACEVEDO-SOSA

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION

DWAYNE REED,

Plaintiff,

vs.

RPM EXPEDITE USA, LLC; and
RICARDO HABACUC ACEVEDO-
SOSA; and DOES 1 to 50 inclusive,

Defendants.

Case No. 2:22-cv3510

**DEFENDANTS RPM EXPEDITE
USA, LLC; AND RICARDO
HABACUC ACEVEDO-SOSA'S
NOTICE OF REMOVAL TO
FEDERAL COURT**

Trial Date: None Set

**NOTICE OF REMOVAL OF CIVIL ACTION TO PLAINTIFF, HIS
ATTORNEYS OF RECORD, AND THE CLERK OF THE UNITED STATES
DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA:**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendants, RPM EXPEDITE USA, LLC; and RICARDO HABACUC ACEVEDO-SOSA ("Defendants") hereby remove this action from the Superior Court of California, County of Riverside, to the United States District Court for the Central District of California, Eastern Division.

1. On or about April 14, 2022, Plaintiff Dwayne Reed ("Plaintiff") filed a Complaint in Superior Court of California in and for the County of Riverside, entitled, *Reed vs. Acevedo-Sosa*, Case No. CVRI2201500 ("the Complaint"),

4882-5206-8895.1

DEFENDANTS RPM EXPEDITE USA, LLC; AND RICARDO HABACUC ACEVEDO-SOSA'S NOTICE OF
REMOVAL TO FEDERAL COURT

1 alleging the following causes of action: (1) motor vehicle; and (2) general
2 negligence.

3 2. A true and correct copy of the Complaint is attached hereto as **Exhibit**
4 **A**. True and correct copies of the Summons and other notices served therewith are
5 attached hereto as **Exhibit B**. A true and correct copy of the state court file
6 constituting all process, pleadings, and other orders filed in the state court action are
7 attached as **Exhibit C**.

8 **I. TIMELINESS**

9 3. Service was effectuated on RICARDO HABACUC ACEVEDO-SOSA
10 on April 23, 2022. Service was effectuated on RPM EXPEDITE USA, LLC on
11 May 2, 2022. This Notice of Removal is timely, as it was filed within 30 days of
12 service on Defendants RICARDO HABACUC ACEVEDO-SOSA and RPM
13 EXPEDITE USA, LLC.

14 **II. VENUE**

15 4. Venue is proper in this district, pursuant to 28 U.S.C. § 1441(a), be-
16 cause it embraces the state court where the removed action has been pending.

17 **III. DIVERSITY JURISDICTION EXISTS**

18 5. This action is one over which this Court has original jurisdiction under
19 28 U.S.C. § 1332(a) and is one which may be removed by Defendants pursuant to
20 28 U.S.C. § 1441. This is a civil action where, based on information and belief,
21 Plaintiff claims an amount in controversy that exceeds \$75,000, exclusive of interest
22 and costs, and is between citizens of different states.

23 6. For diversity purposes, a limited liability company is a citizen of the
24 state of each of its members. *Bayerische Landesbank v. Aladdin Capital Mgmt.*
25 *LLC*, (2012) 692 F.3d 42, 49.

26 7. Defendant RPM EXPEDITE USA, LLC is a limited liability company,
27 which does, and at all times alleged in the Complaint has, its principle place of
28 business in the state of Texas. (RPM Expedite USA, LLC Decl., ¶ 3-4.) See *Hertz*

1 *v. Friend*, 130 S. Ct. 1181, 1192 (2010). A company’s principal place of business
 2 is the state in which its “high level officers direct, control and coordinate the
 3 corporation’s activities.” *Id.* at 1186. The Supreme Court has also held that the
 4 place of citizenship “should normally be the place where the corporation maintains
 5 its headquarters—provided that the headquarters is the actual center of direction,
 6 control, and coordination.” *Id.* Defendant’s corporate headquarters is located in
 7 Fort Worth, Texas. (RPM Expedite USA, LLC Decl., ¶ 4.) The majority of
 8 Defendant’s high-level executive, marketing, and legal functions take place in Fort
 9 Worth, Texas. (RPM Expedite USA, LLC Decl., ¶ 5.) Defendant’s officers,
 10 including the President/Chief Executive Officer, Chief Financial Officer, and
 11 General Counsel, direct, control, and coordinate the corporation’s activities in Fort
 12 Worth, Texas. (RPM Expedite USA, LLC Decl., ¶ 5.) Accordingly, Defendant’s
 13 principal place of business is Dallas, Texas for diversity purposes.

14 8. The members of RPM EXPEDITE USA, LLC, a Texas company, are
 15 not citizens of the State of California. RPM EXPEDITE USA, LLC’s members
 16 include Eric Kunz, an individual and Orzy 101, Inc. Eric Kunz is a resident of Fort
 17 Worth, Texas. Orzy 101, Inc. was incorporated in the state of Delaware. (RPM
 18 Expedite USA, LLC Decl., ¶ 5.)

19 9. Because Defendant RPM EXPEDITE USA, LLC has its principal place
 20 of business in the State of Texas, and its members are residents of Texas and
 21 Delaware, Defendant RPM EXPEDITE USA, LLC is a citizen of the State of
 22 Delaware and Texas for diversity purposes.

23 10. Defendant RICARDO HABACUC ACEVEDO-SOSA resides in
 24 Arlington, Texas. (ACEVEDO-SOSA Decl., ¶ 2.)

25 11. Based on the allegations set forth in the Complaint, the alleged incident
 26 occurred in Riverside, California. (RPM Expedite USA, LLC Decl., ¶ 6.) Based on
 27 information and belief, Plaintiff is a resident of Corona, California. (Ryan J.
 28 Anderson Decl. ¶ 3.) Therefore, for purposes of evaluating diversity, Plaintiff is a

1 resident of the State of California. See 28 U.S.C. 1332(a)(1) (an individual is a
 2 citizen of the state in which he or she is domiciled); *State Farm Mut. Auto. Ins. Co.*
 3 *v. Dyer*, 19 F.3d 514, 520 (10th Cir. 1994) (recognizing that residence is prima facie
 4 evidence of domicile for purposes of determining citizenship).

5 12. The citizenship of fictitiously named “Doe” defendants is disregarded
 6 for removal purposes. 28 U.S.C. § 1441(a).

7 13. Based on the foregoing, complete diversity between the parties exists.

8 **IV. THE AMOUNT-IN-CONTROVERSY REQUIREMENT IS SATISFIED**

9 14. The amount in controversy appears to exceed the sum or value of
 10 \$75,000 exclusive of interest and costs. Removal is proper if, from the allegations of
 11 the Complaint and the Notice of Removal, it is more likely than not that the claim
 12 exceeds \$75,000. 28 U.S.C. § 1446; *Sanchez v. Monumental Life Ins. Co.*, 102 F. 3d
 13 398, 403-04 (9th Cir. 1996).

14 15. When analyzing the amount-in-controversy, a settlement demand in
 15 excess of the jurisdictional minimum may be used as evidence to establish the
 16 statutory requirement. *Cohn v. Petsmart, Inc.*, 281 F.3d 837, 840 n.3 (9th Cir. 2002)
 17 (holding A settlement letter is relevant evidence of the amount in controversy and
 18 Fed. R. Evid. 408 is inapplicable where a settlement demand is used to establish
 19 Plaintiff’s value of a case). Where a Plaintiff has placed the requisite jurisdictional
 20 amount in controversy by requesting damages in excess of the jurisdictional amount,
 21 it is highly unlikely that the plaintiff would have inflated his request for damages
 22 solely to obtain federal jurisdiction. *Sanchez v. Monumental Life Ins. Co.*, 102 F. 3d
 23 398, 402 (9th Cir. 1996).

24 16. Defendants deny any and all liability to Plaintiff, and disputes the
 25 nature and extent of Plaintiff’s claimed injuries. However, Plaintiff made a pre-suit
 26 settlement demand which clearly alleges damages well over the \$75,000 amount-in-
 27 controversy requirement. (Ryan J. Anderson Declaration ¶ 2.); see also *Singer v.*
 28 *State Farm Mut. Auto. Ins. Co.*, 116 F. 3d 373, 376-377 (9th Cir. 1997) (holding that

1 where a complaint does not allege a specific dollar amount, the case is removable if
 2 the removing defendant shows by a preponderance of the evidence that the
 3 jurisdictional amount is present); *Simmons v. PCR Tech.*, 209 F. Supp. 2d 1029,
 4 1031-35 (ND. Cal. 2002) (holding that a plaintiff's damage claim, including lost
 5 wages, medical expenses, and emotional distress and attorneys' fees, was enough to
 6 put the amount in controversy above \$75,000).

7 WHEREFORE, the proceeding paragraphs establishing that the Court has
 8 original jurisdiction over this action pursuant to 28 U.S.C. § 1331, Defendants
 9 respectfully give notice that the action pending in the Superior Court of the State of
 10 California in and for the County of Riverside and captioned *DWAYNE REED v.*
 11 *RPM EXPEDITE USA, LLC; and RICARDO HABACUC ACEVEDO-SOSA*, Case
 12 No.: CVRI2201500, is removed to the United States District Court, for the Central
 13 District of California.

14
 15 DATED: May 23, 2022

LEWIS BRISBOIS BISGAARD & SMITH LLP

16
 17
 18 By: 

ESTHER P. HOLM

RYAN J. ANDERSON

Attorneys for RPM EXPEDITE USA,
 LLC; and RICARDO HABACUC
 ACEVEDO-SOSA

EXHIBIT "A"

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Matthew Taylor, Esq. (SBN 252556), Aaron G. Miller, Esq. (SBN 279126) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd, Suite 670 Los Angeles, California 90036 TELEPHONE NO: 310-777-7540 FAX NO. (Optional): 310-777-0373 E-MAIL ADDRESS (Optional): mtaylor@vazirilaw.com; amiller@vazirilaw.com ATTORNEY FOR (Name): Plaintiff, DWAYNE REED		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside 92501 BRANCH NAME: Riverside Historic Courthouse		
PLAINTIFF: DWAYNE REED DEFENDANT: RPM EXPEDITE USA, LLC; RICARDO HABACUC ACEVEDO-SOSA; and <input checked="" type="checkbox"/> DOES 1 TO 50 inclusive		
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input type="checkbox"/> OTHER (specify): <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER: CVRI 2201500

1. **Plaintiff (name or names):** DWAYNE REED

alleges causes of action against **defendant (name or names):**

RPM EXPEDITE USA, LLC; RICARDO HABACUC ACEVEDO-SOSA; and DOES 1 to 50, Inclusive

2. This pleading, including attachments and exhibits, consists of the following number of pages: 5

3. Each plaintiff named above is a competent adult

a. ☐ **except** plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

b. ☐ **except** plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: REED v. RPM EXPEDITE USA, LLC, et al.	CASE NUMBER: CVRI 2201500
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4. ☐ Plaintiff (*name*):
 is doing business under the fictitious name (*specify*):

 and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ **except** defendant (*name*): RPM Expedite USA
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☒ an unincorporated entity (*describe*):
 LLC
 (4) ☐ a public entity (*describe*):
 (5) ☐ other (*specify*):
- c. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):
 (4) ☐ a public entity (*describe*):
 (5) ☐ other (*specify*):
- b. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):
 (4) ☐ a public entity (*describe*):
 (5) ☐ other (*specify*):
- d. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):
 (4) ☐ a public entity (*describe*):
 (5) ☐ other (*specify*):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (*specify Doe numbers*): 1 to 25 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (*specify Doe numbers*): 26 to 50 are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (*names*):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (*specify*):
9. ☐ Plaintiff is required to comply with a claims statute, and
- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (*specify*):

PLD-PI-001

SHORT TITLE:

CASE NUMBER:

REED v. RPM EXPEDITE USA, LLC, et al.

CVRI 2201500

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (*specify*):

Future medical expenses; Future pain and suffering; Other damages to be determined up through discovery and up through the time of trial.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☐ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: April 14, 2022

Aaron G. Miller, Esq.

(TYPE OR PRINT NAME)



/s/ Aaron G. Miller

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

REED v. RPM EXPEDITE USA, LLC, et al.

CASE NUMBER:

CVRI 2201500

First _____
(number)**CAUSE OF ACTION—Motor Vehicle**ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): Dwayne Reed

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): June 22, 2020

at (place):

Near the intersection of Etiwanda Avenue & Riverside Drive, in the City of Jurupa Valley, in Riverside County, California.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names):
Ricardo Habacuc Acevedo-Sosa, and☒ Does 1 _____ to 50 _____b. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):
Ricardo Habacuc Acevedo-Sosa; RPM Expedite USA, LLC, and☒ Does 1 _____ to 50 _____c. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names):
Ricardo Habacuc Acevedo-Sosa; RPM Expedite USA, LLC, and☒ Does 1 _____ to 50 _____d. ☒ The defendants who entrusted the motor vehicle are (names):
Ricardo Habacuc Acevedo-Sosa; RPM Expedite USA, LLC, and☒ Does 1 _____ to 50 _____e. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):
Ricardo Habacuc Acevedo-Sosa; RPM Expedite USA, LLC, and☒ Does 1 _____ to 50 _____f. ☒ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are
☐ listed in Attachment MV-2f ☒ as follows:

Ricardo Habacuc Acevedo-Sosa; RPM Expedite USA, LLC, and

☒ Does 1 _____ to 50 _____

Page 4

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SHORT TITLE: REED v. RPM EXPEDITE USA, LLC, et al.	CASE NUMBER: CVRI 2201500
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Second _____ **C USE OF CT ON e eral Ne li e ce** Page 5
 (number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Dwayne Reed

alleges that defendant (name): RPM Expedite USA, LLC Richard A. Aved S. sa

☒ Does 1 to 50

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): June 22, 2020

at (place): Near the intersection of Etiwanda Avenue & Riverside Drive, in the City of Jurupa Valley, in Riverside County, California.

(description of reasons for liability):

At said time and place, Defendants, and each of them, negligently owned, maintained, operated, entrusted, and/or drove their motor vehicle so as to cause injuries and damages to Plaintiff. Plaintiff was injured and sustained damages as a direct legal cause of Defendants' negligence and but for negligence of Defendants, Plaintiff would not have been injured and/or sustained damages. Furthermore, Defendants and each of them are negligent per se for violating the California Vehicle Code. These Vehicle Code violations were the legal and direct cause of injuries and damages sustained by Plaintiff

a e f

EXHIBIT "B"

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
PROOF OF SERVICE SUMMONS		Hearing Date:	Time:	Dept./Hr:	Case Number: CVRI2201500 CVRI2201500

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the Summons; Complaint; Notice of Department Assignment
3.
 - a. Party served: RICARDO HABACUC ACEVEDO-SOSA
 - b. Person served: Naoil Sanchez, Wife
4. Address where the party was served: 2367 Quail Run Rd, Arlington, TX 76014
5. I served the party:
 - b. by substituted service. On: Sat, Apr 23 2022 at: 01:30 PM I left the documents listed in Item 2 with or in the presence of:
Naoil Sanchez, Wife
- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) ☒ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) ☒ (Declaration of Mailing) is attached.
 - (5) ☒ (Declaration of Diligence) attached stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. ☒ as an individual defendant.
 - b. ☐ as the person sued under the fictitious name of (specify):
 - c. ☐ as occupant.
 - d. ☐ On behalf of (specify):
under the following Code of Civil Procedure section:

<input type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	



Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only
Ref. No. or File No.: Dwayne Reed v. RPM Expedite				
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse				
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL				
PROOF OF SERVICE SUMMONS	Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

Recoverable cost Per CCP 1033.5(a)(4)(B)

7. Person who served papers

- a. Name: Kim Shaw
- b. Address: FIRST LEGAL
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. The fee for service was: \$249.25
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor
- (ii) Registration No:
- (iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

04/25/2022

(Date)

Kim Shaw

Kim Shaw



Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
AFFIDAVIT OF DUE DILIGENCE		Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

1. I, Kim Shaw, and any employee or independent contractors retained by FIRST LEGAL are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on subject RICARDO HABACUC ACEVEDO-SOSA as follows:
2. Documents: Summons; Complaint; Notice of Department Assignment

Attempt Detail

- 1) Unsuccessful Attempt by: Kim Shaw on: Apr 21, 2022, 7:45 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014
No answer and no activity seen in the home.
- 2) Unsuccessful Attempt by: Kim Shaw on: Apr 22, 2022, 3:30 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014
Spoke with elderly Hispanic lady, didn't speak much English. I was able to confirm he live here but not here.
- 3) Successful Attempt by: Kim Shaw on: Apr 23, 2022, 1:30 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014 received by Naoli Sanchez, Wife



AFFIDAVIT OF
DUE DILIGENCE

6980775
(4960585)
Page 1 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
AFFIDAVIT OF DUE DILIGENCE		Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

Recoverable cost Per CCP 1033.5(a)(4)(B)

3. Person who served papers

- a. Name: Kim Shaw
- b. Address: **FIRST LEGAL**
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. The fee for service was: \$249.25
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor
- (ii) Registration No:
- (iii) County:

4. I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct.

04/25/2022

(Date)

Kim Shaw

(Signature)


 AFFIDAVIT OF
 DUE DILIGENCE

 6980775
 (4960585)
 Page 2 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only
Ref. No. or File No.: Dwayne Reed v. RPM Expedite				
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse				
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL				
PROOF OF SERVICE By Mail	Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

- I am over the age of 18 and not a party to this action. I am employed in the county where the mailing occurred.
- I served copies of the Summons; Complaint; Notice of Department Assignment
- By placing a true copy of each document in the United States mail, in a sealed envelope by **First Class** mail with postage prepaid as follows:
 - Date of Mailing: Mon, Apr 25, 2022
 - Place of Mailing: LOS ANGELES, CA 90026
 - Addressed as follows: RICARDO HABACUC ACEVEDO-SOSA
2367 Quail Run Rd, Arlington, TX 76014
- I am readily familiar with the business practice for collection and processing of correspondence as deposited with the U.S. Postal Service on Mon, Apr 25, 2022 in the ordinary course of business.

Recoverable cost Per CCP 1033.5(a)(4)(B)

5. Person Serving:

- THOMAS TILCOCK
- FIRST LEGAL**
1517 W. Beverly Boulevard
LOS ANGELES, CA 90026
- (213) 250-1111

- The Fee for Service** was: \$249.25
- I am: Not a Registered California Process Server

- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

04/25/2022

(Date)



Thomas Tilcock



Judicial Council Form
Rule 2.150.(a)&(b) Rev January 1, 2007

**PROOF OF SERVICE
BY MAIL**

6980775
(4960585)

EXHIBIT "C"

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

AARON G. MILLER
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof of Service* for the reason(s) indicated below:


Proof of Service submitted via eFile transaction 22RSCR00111533. A declaration of mailing is needed to effect substituted service.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 05/18/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by: 

B. Votruba, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

DWAYNE REED

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AARON G. MILLER
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof of Service Summons* for the reason(s) indicated below:

Proof of Service Summons received on 5/18/2022, via eFile (transaction #: 22RSCR00112448), date of mailing is needed. Furthermore, section 5.b.(4) states Declaration of Mailing is attached, however, said Declaration of Mailing is not attached. Proof of Service by Mail was uploaded as a separate document. Contacted plaintiff's counsel via phone to clarify reason for rejection. This document has been previously rejected three times.

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Dated: 05/18/2022

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Court Executive Officer/Clerk of Court

by: 

B. Prado, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

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4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

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Historic Court House
 4050 Main Street, Riverside, CA 92501
www.riverside.courts.ca.gov

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

AARON G. MILLER
 5757 WILSHIRE BLVD STE 670
 Los Angeles, CA 90036

**AMENDED NOTICE OF HEARING
 (CIVIL)**



Amended notice is hereby given that a Case Management Conference is scheduled on this case as follows:

Hearing Date	Hearing Time	Department
10/17/2022	8:30 AM	Department 2
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-143-8184 #
 Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

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Dated: 05/04/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by: Louder Melendrez
L. Melendrez, Deputy Clerk

Notice has been printed for the following Firm/Attorneys or Parties: CVRI2201500

MILLER, AARON G.
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

☐ **BANNING** 311 E. Ramsey St., Banning, CA 92220
☐ **BLYTHE** 265 N. Broadway, Blythe, CA 92225
☐ **CORONA** 505 S. Buena Vista, Rm. 201, Corona, CA 92882
☐ **MORENO VALLEY** 13800 Heacock St., Ste. D201,
 Moreno Valley, CA 92553

RI-CI032

Page 1 of 1
Local Rule 3117
riverside.courts.ca.gov/localfrms/localfrms.shtml

ATTORNEY OR PART WITHOUT ATTORNEY (Name, State Bar number, and address): Matthew Taylor, Esq. (SBN 252556), Aaron G. Miller, Esq. (SBN 279126) Vaziri Law Group, APC. 5757 Wilshire Blvd., Suite 670 Los Angeles, CA 90036 TELEPHONE NO.: 310-777-7540 FAX NO.: 310-777-0373 ATTORNEY FOR (Name): Plaintiff, DWAYNE REED		O O S ON
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 4050 Main Street MAILIN ADDRESS: 4050 Main Street CIT AND IP CODE: Riverside 92501 BRANCH NAME: Riverside Historic Courthouse		CASE NUMBER: CVR 2201500
CASE NAME: Dwayne Reed v. RPM Expedite USA, LLC, et al		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds 25,000) <input type="checkbox"/> Limited (Amount demanded is 25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule .402)	
Items 1-6 below must be completed (see instructions on page 2).		JUD E: DEPT:

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input checked="" type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (4) Other PI PD WD (Personal Injury Property Damage Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI PD WD (2) Non-PI PD WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (0) <input type="checkbox"/> Defamation (1) <input type="checkbox"/> Fraud (1) <input type="checkbox"/> Intellectual property (1) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI PD WD tort (5) Employment <input type="checkbox"/> Wrongful termination () <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (0) <input type="checkbox"/> Rule .740 collections (0) <input type="checkbox"/> Other collections (0) <input type="checkbox"/> Insurance coverage (1) <input type="checkbox"/> Other contract () Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction () <input type="checkbox"/> Other real property (2) Unlawful Detainer <input type="checkbox"/> Commercial (1) <input type="checkbox"/> Residential (2) <input type="checkbox"/> Drugs () Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> writ of mandate (02) <input type="checkbox"/> Other judicial review ()	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.003-3.03) <input type="checkbox"/> Antitrust/Trade regulation (0) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (2) <input type="checkbox"/> Environmental/Toxic tort () <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (4)
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2. This case ☐ is ☒ is not complex under rule .400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): Total 2
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 14, 2022
 Aaron G. Miller, Esq.

(TYPE OR PRINT NAME)

/s/ Aaron G. Miller
 (SIGNATURE OF PART OR ATTORNEY FOR PART)

NOTICE

Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule .220.) Failure to file may result in sanctions.
 File this cover sheet in addition to any cover sheet required by local court rule.
 If this case is complex under rule .400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on **all** other parties to the action or proceeding.
 Unless this is a collections case under rule .740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 10 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.0 and 2.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES**Auto Tort**

Auto (22) Personal Injury Property
Damage Wrongful Death
Uninsured Motorist (4) (if the
case involves an uninsured
motorist claim subject to
arbitration, check this item
instead of Auto)

**Other PI PD WD (Personal Injury
Property Damage Wrongful Death)
Tort**

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury
Wrongful Death
Product Liability (not asbestos or
toxic environmental) (24)
Medical Malpractice (45)
Medical Malpractice
Physicians Surgeons
Other Professional Health Care
Malpractice
Other PI PD WD (2)
Premises Liability (e.g., slip
and fall)
Intentional Bodily Injury PD WD
(e.g., assault, vandalism)
Intentional Infliction of
Emotional Distress
Negligent Infliction of
Emotional Distress
Other PI PD WD

Non-PI PD WD (Other) Tort

Business Tort Unfair Business
Practice (07)
Civil Rights (e.g., discrimination,
false arrest) (not civil
harassment) (0)
Defamation (e.g., slander, libel)
(1)
Fraud (1)
Intellectual Property (1)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice
(not medical or legal)
Other Non-PI PD WD Tort (5)

Employment

Wrongful Termination ()
Other Employment (15)

Contract

Breach of Contract Warranty (0)
Breach of Rental Lease
Contract (not unlawful detainer
or wrongful eviction)
Contract Warranty Breach Seller
Plaintiff (not fraud or negligence)
Negligent Breach of Contract
Warranty
Other Breach of Contract Warranty
Collections (e.g., money owed, open
book accounts) (0)
Collection Case Seller Plaintiff
Other Promissory Note Collections
Case
Insurance Coverage (not provisionally
complex) (1)
Auto Subrogation
Other Coverage
Other Contract (7)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain Inverse
Condemnation (14)
Wrongful Eviction ()
Other Real Property (e.g., quiet title) (2)
Right of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent
domain, landlord tenant, or
foreclosure)

Unlawful Detainer

Commercial (1)
Residential (2)
Drugs () (if the case involves illegal
drugs, check this item; otherwise,
report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ Administrative Mandamus
Writ Mandamus on Limited Court
Case Matter
Writ Other Limited Court Case
Review
Other Judicial Review ()
Review of Health Officer Order
Notice of Appeal Labor
Commissioner Appeals

**Provisionally Complex Civil Litigation (Cal
Rules of Court Rules 3.003-3.03)**

Antitrust Trade Regulation (0)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (2)
Environmental Toxic Tort (0)
Insurance Coverage Claims
(arising from provisionally complex
case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of
County)
Confession of Judgment (non-
domestic relations)
Sister State Judgment
Administrative Agency Award
(not unpaid taxes)
Petition Certification of Entry of
Judgment on Unpaid Taxes
Other Enforcement of Judgment
Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (not specified
above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-
harassment)
Mechanics Lien
Other Commercial Complaint
Case (non-tort non-complex)
Other Civil Complaint
(non-tort non-complex)

Miscellaneous Civil Petition

Partnership and Corporate
Governance (21)
Other Petition (not specified
above) (4)
Civil Harassment
or Place Violence
Elder Dependent Adult
Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late
Claim
Other Civil Petition

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

AARON G. MILLER
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
10/17/2022	8:30 AM	Department 2
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.



The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-143-8184 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	<p>Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.</p>
	<p>Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)</p>

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Dated: 04/20/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

DWAYNE REED

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Dated: 04/20/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

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Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	<p>Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.</p>
	<p>Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)</p>

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the Notice of Case Management Conference on this date, by depositing said copy as stated above.

Dated: 04/20/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

RPM EXPEDITE USA, LLC

NOTICE OF CASE MANAGEMENT CONFERENCE

The Case Management Conference is scheduled as follows:

Hearing Date	Hearing Time	Department
10/17/2022	8:30 AM	Department 2
Location of Hearing: 4050 Main Street, Riverside, CA 92501		

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.



The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Remote Appearance at Hearing: The court **strongly encourages** parties and counsel to appear remotely for non-evidentiary hearings in civil cases. Pursuant to local rule 3132, persons intending to appear remotely shall notify all opposing parties of their intention to appear remotely before the hearing. Notice may be given informally, including by telephone, email, or text message. To appear remotely, on the day of the hearing, either use your computer, mobile device, or dial (833) 568-8864 (toll free) or (669) 254-5252, when prompted enter:

Meeting ID: 161-143-8184 #
Access Code: Press the # key (no number after the #)

Please MUTE your phone until your case is called, and it is your turn to speak. It is important to note that you must call twenty (20) minutes prior to the scheduled hearing time to check in or there may be a delay in your case being heard.

	<p>Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.</p>
	<p>Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)</p>

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Dated: 04/20/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

Notice has been printed for the following Firm/Attorneys or Parties: CVRI2201500

MILLER, AARON G.
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

REED, DWAYNE

RPM EXPEDITE USA, LLC

ACEVEDO-SOSA, RICARDO HABACUC

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

NOTICE OF DEPARTMENT ASSIGNMENT



The above entitled case is assigned to the Honorable Carol A. Greene in Department 2 for All Purposes.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

The court follows California Rules of Court, Rule 3.1308(a)(1) for tentative rulings (see Riverside Superior Court Local Rule 3316). Tentative Rulings for each law and motion matter are posted on the internet by 3:00 p.m. on the court day immediately before the hearing at <http://riverside.courts.ca.gov/tentativerulings.shtml>. If you do not have internet access, you may obtain the tentative ruling by telephone at (760) 904-5722.

To request oral argument, you must (1) notify the judicial secretary at (760) 904-5722 and (2) inform all other parties, no later than 4:30 p.m. the court day before the hearing. If no request for oral argument is made by 4:30 p.m., the tentative ruling will become the final ruling on the matter effective the date of the hearing.

The filing party shall serve a copy of this notice on all parties.

	Interpreter services are available upon request. If you need an interpreter, please complete and submit the online Interpreter Request Form (https://riverside.courts.ca.gov/Divisions/InterpreterInfo/ri-in007.pdf) or contact the clerk's office and verbally request an interpreter. All requests must be made in advance with as much notice as possible, and prior to the hearing date in order to secure an interpreter.
	Assistive listening systems, computer-assisted real time captioning, or sign language interpreter services are available upon request if at least 5 days notice is provided. Contact the Office of the ADA Coordinator by calling (951) 777-3023 or TDD (951) 777-3769 between 8:00 am and 4:30 pm or by emailing ADA@riverside.courts.ca.gov to request an accommodation. A <i>Request for Accommodations by Persons With Disabilities and Order</i> (form MC-410) must be submitted when requesting an accommodation. (Civil Code section 54.8.)

Dated: 04/20/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SIAMAK VAZIRI, ESQ. [SBN 242447]
MATTHEW M. TAYLOR, ESQ. [SBN 252556]
AARON G. MILLER, ESQ. [SBN 279126]
VAZIRI LAW GROUP, APC
5757 Wilshire Blvd., Ste. 670
Los Angeles, CA 90036
Telephone: (310) 777-7540
Facsimile: (310) 777-0373

Attorneys for Plaintiff, DWAYNE REED

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

DWAYNE REED,

Plaintiff,

vs.

RPM EXPEDITE USA, LLC; RICARDO
HABACUC ACEVEDO-SOSA; and DOES 1 to
50, inclusive,

Defendant(s).

Case No.: CVRI2201500

NOTICE OF POSTING JURY FEES

TO ALL PARTIES AND TO THEIR ATTORNEY OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiff DWAYNE REED, hereby posts jury fees in
the above-referenced matter in the amount of \$150.00.

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DATED: April 20, 2022

VAZIRI LAW GROUP, APC

By: _____/s/ Aaron Miller_____
SIAMAK VAZIRI, ESQ.
MATTHEW TAYLOR, ESQ.
AARON G. MILLER, ESQ.
Attorneys for Plaintiff,
DWAYNE REED

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

AARON G. MILLER
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof of Service Summons* for the reason(s) indicated below:

Declaration of Mailing and Declaration of Diligence are not attached to the submission as indicated on POS-010. Documents may be added after the second page of the proof of service. Please review and resubmit accordingly. Document received via eFiling on 05/13/2022. Transaction ID# 22RSCR00108995 - One Legal

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 05/17/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

DWAYNE REED

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof of Service Summons* for the reason(s) indicated below:

Declaration of Mailing and Declaration of Diligence are not attached to the submission as indicated on POS-010. Documents may be added after the second page of the proof of service. Please review and resubmit accordingly. Document received via eFiling on 05/13/2022. Transaction ID# 22RSCR00108995 - One Legal

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Dated: 05/17/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



A. Brown, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

AARON G. MILLER
5757 WILSHIRE BLVD STE 670
Los Angeles, CA 90036

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof Of Service* for the reason(s) indicated below:

Proof of Service received on 04/28/2022 has been rejected for the following reason: Declaration of Mailing was not attached to original document. Please resubmit when correction has been made.

Transaction ID: 22RSCR00096029

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 05/13/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by:



S. Anderson, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

Historic Court House
4050 Main Street, Riverside, CA 92501

Case Number: CVRI2201500

Case Name: REED vs ACEVEDO-SOSA

DWAYNE REED

NOTICE OF RETURN DOCUMENT

The court is unable to process the *Proof Of Service* for the reason(s) indicated below:

Proof of Service received on 04/28/2022 has been rejected for the following reason: Declaration of Mailing was not attached to original document. Please resubmit when correction has been made.

Transaction ID: 22RSCR00096029

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 05/13/2022

W. SAMUEL HAMRICK JR.,
Court Executive Officer/Clerk of Court

by: 

S. Anderson, Deputy Clerk

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only
Ref. No. or File No.: Dwayne Reed v. RPM Expedite				
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse				
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL				
PROOF OF SERVICE SUMMONS	Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the Summons and Complaint
3.
 - a. Party served: RPM EXPEDITE USA, LLC
 - b. Person served: Eric Kunz, Registered Agent for Service of Process
4. Address where the party was served: 5457 Sandshell Dr, Fort Worth, TX 76137
5. I served the party:
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Mon, May 02 2022 at: 10:57 AM
 - (1) ☒ (business)
 - (2) ☐ (home)
 - (3) ☐ (other) :
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. ☐ as an individual defendant.
 - b. ☐ as the person sued under the fictitious name of (specify):
 - c. ☐ as occupant.
 - d. ☒ On behalf of (specify): RPM EXPEDITE USA, LLC
 under the following Code of Civil Procedure section:

<input checked="" type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	



Judicial Council Form POS-010
Rule 2.150.(a)&(b) Rev January 1, 2007

**PROOF OF
SERVICE
SUMMONS**

7036656
(112507)
Page 1 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only
Ref. No. or File No.: Dwayne Reed v. RPM Expedite				
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse				
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL				
PROOF OF SERVICE SUMMONS	Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

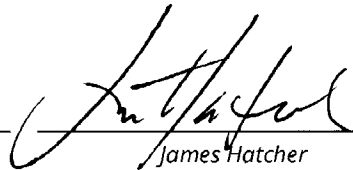
Recoverable cost Per CCP 1033.5(a)(4)(B)

7. Person who served papers

- a. Name: James Hatcher
- b. Address: **FIRST LEGAL INVESTIGATIONS**
2070 N. TUSTIN AVENUE, 2ND FLOOR
SANTA ANA, CA 92705
- c. Telephone number: (714) 550-1375
- d. The fee for service was: \$619.30
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor
- (ii) Registration No:
- (iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

5/4/22
(Date)


James Hatcher



Judicial Council Form POS-010
Rule 2.150.(a)&(b) Rev January 1, 2007

**PROOF OF
SERVICE
SUMMONS**

7036656
(112507)
Page 2 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
PROOF OF SERVICE SUMMONS		Hearing Date:	Time:	Dept./Ohr:	Case Number: CVRI2201500 CVRI2201500

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the Summons; Complaint; Notice of Department Assignment
3.
 - a. Party served: RICARDO HABACUC ACEVEDO-SOSA
 - b. Person served: Naoil Sanchez, Wife
4. Address where the party was served: 2367 Quail Run Rd, Arlington, TX 76014
5. I served the party:
 - b. by substituted service. On: Sat, Apr 23 2022 at: 01:30 PM I left the documents listed in Item 2 with or in the presence of:
Naoil Sanchez, Wife
- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) ☒ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) ☒ (Declaration of Mailing) is attached.
 - (5) ☒ (Declaration of Diligence) attached stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. ☒ as an individual defendant.
 - b. ☐ as the person sued under the fictitious name of (specify):
 - c. ☐ as occupant.
 - d. ☐ On behalf of (specify):
under the following Code of Civil Procedure section:

<input type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	



Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only
Ref. No. or File No.: Dwayne Reed v. RPM Expedite				
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse				
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL				
PROOF OF SERVICE SUMMONS	Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

Recoverable cost Per CCP 1033.5(a)(4)(B)

7. Person who served papers

- a. Name: Kim Shaw
- b. Address: FIRST LEGAL
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. The fee for service was: \$249.25
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor
- (ii) Registration No:
- (iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

04/25/2022

(Date)

Kim Shaw

Kim Shaw



Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
AFFIDAVIT OF DUE DILIGENCE		Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

1. I, Kim Shaw, and any employee or independent contractors retained by FIRST LEGAL are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on subject RICARDO HABACUC ACEVEDO-SOSA as follows:
2. Documents: Summons; Complaint; Notice of Department Assignment

Attempt Detail

- 1) Unsuccessful Attempt by: Kim Shaw on: Apr 21, 2022, 7:45 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014
No answer and no activity seen in the home.
- 2) Unsuccessful Attempt by: Kim Shaw on: Apr 22, 2022, 3:30 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014
Spoke with elderly Hispanic lady, didn't speak much English. I was able to confirm he live here but not here.
- 3) Successful Attempt by: Kim Shaw on: Apr 23, 2022, 1:30 pm CDT at 2367 Quail Run Rd, Arlington, TX 76014 received by Naoli Sanchez, Wife



AFFIDAVIT OF
DUE DILIGENCE

6980775
(4960585)
Page 1 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
AFFIDAVIT OF DUE DILIGENCE		Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

Recoverable cost Per CCP 1033.5(a)(4)(B)

3. Person who served papers

- a. Name: Kim Shaw
- b. Address: **FIRST LEGAL**
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. The fee for service was: \$249.25
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor
- (ii) Registration No:
- (iii) County:

4. I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct.

04/25/2022

(Date)



(Signature)



AFFIDAVIT OF
DUE DILIGENCE

6980775
(4960585)
Page 2 of 2

Attorney or Party without Attorney: Matthew Taylor (SBN 252556) VAZIRI LAW GROUP, APC 5757 Wilshire Blvd., Suite 670 Los Angeles, California, 90036 Telephone No: 310-777-7540 Attorney For: Plaintiff				For Court Use Only	
Ref. No. or File No.: Dwayne Reed v. RPM Expedite					
Insert name of Court, and Judicial District and Branch Court: Superior Court of California, County of Riverside, Historic Courthouse					
Plaintiff: DWAYNE REED Defendant: RPM EXPEDITE USA, LLC; ET AL					
PROOF OF SERVICE By Mail		Hearing Date:	Time:	Dept/Div:	Case Number: CVRI2201500

- I am over the age of 18 and not a party to this action. I am employed in the county where the mailing occurred.
- I served copies of the Summons; Complaint; Notice of Department Assignment
- By placing a true copy of each document in the United States mail, in a sealed envelope by **First Class** mail with postage prepaid as follows:
 - Date of Mailing: Mon, Apr 25, 2022
 - Place of Mailing: LOS ANGELES, CA 90026
 - Addressed as follows: RICARDO HABACUC ACEVEDO-SOSA
2367 Quail Run Rd, Arlington, TX 76014
- I am readily familiar with the business practice for collection and processing of correspondence as deposited with the U.S. Postal Service on Mon, Apr 25, 2022 in the ordinary course of business.

Recoverable cost Per CCP 1033.5(a)(4)(B)

5. Person Serving:

- THOMAS TILCOCK
- FIRST LEGAL**
1517 W. Beverly Boulevard
LOS ANGELES, CA 90026
- (213) 250-1111

- The Fee for Service** was: \$249.25
- I am: Not a Registered California Process Server

- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

04/25/2022

(Date)



Thomas Tilcock



Judicial Council Form
Rule 2.150.(a)&(b) Rev January 1, 2007

**PROOF OF SERVICE
BY MAIL**

6980775
(4960585)

CALIFORNIA STATE COURT PROOF OF SERVICE

Reed, Dwayne v. Ricardo Habacuc Acevedo-Sosa, et al.

Case No.

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and not a party to this action. My business address is 650 Town Center Drive, Suite 1400, Costa Mesa, CA 92626.

On May 23, 2022, I served true copies of the following document(s):
DEFENDANTS RPM EXPEDITE USA, LLC; AND RICARDO HABACUC
ACEVEDO-SOSA'S NOTICE OF REMOVAL TO FEDERAL COURT

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

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☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent from e-mail address Stacy.Gibboney@lewisbrisbois.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 23, 2022, at Costa Mesa, California.

Stacy Gibboney

Stacy Gibboney